

Mr. Thomas Lund
United States Mineral Products Company
d/b/a Isolatek International
P.O. Box 5006
Huntington, IN 46750

Re: **069-12578**
Second Administrative Amendment to
Part 70 T 069-5660-00021

Dear Mr. Lund:

United States Mineral Products Company - d/b/a Isolatek International, was issued a permit on December 28, 1999 for a stationary acoustic and thermal insulation manufacturing source. A letter requesting changes in the range of pressure drops, clarification of item (n) of equipment list, removal of item (z) of the equipment list, and replace one (1) of the augers in item (h) of the equipment list with a mixed binder surge hopper scale system was received on August 4, 2000 with supplemental information received on September 1 and 5, 2000. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

1. The source has requested that the range of pressure drops in Condition D.1.6 be changed to 0.2 to 10:

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#1 and CE#2) and screenhouses (CE#3 and CE#4) used in conjunction with the two (2) cupolas and two (2) blowchambers, at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#1 and CE#2 shall be maintained within the range of 3.0 and 12.0 inches of water and the pressure drop across screenhouses CE#3 and CE#4 shall be maintained within the range of **0.2** ~~2-8~~ and 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

2. The source has requested that Item (n) of the equipment list in Condition A.2 and Section D.2 be changed since it was incorrectly specified to be equipped with a baghouse rather than a pneumatic conveyor. This change does not affect the potential-to-emit.

(n) One (1) mineral wool bin, known as EU#8, installed **in 1983 or 1984** ~~before 1980~~, equipped with a **pneumatic conveyor that incorporates a totally enclosed air recycled system** ~~baghouse, known as CE#6, exhausted to Stack #6~~, capacity: 10.0 tons of mineral wool per hour.

3. The source has requested to remove Item (z) in Condition A.2 and Section D.2 of the equipment list in Condition A.2 and elsewhere in the permit:

(z) ~~One (1) perlite hopper, known as EU#39, installed in 1991, exhausted to Stack #22 indoors, capacity: 0.5 tons of perlite per hour. Removed by AAT 069-12578~~

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the indicated facilities shall not exceed the PM emission limitations specified at the specified process weight rates listed in following table:

Emission Unit(s)	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
EU#39	0.5	2.58

4. The source has requested the addition of new equipment as Item (aa) of the equipment list to replace one(1) of the augers listed as item (h) in the equipment list in Condition A.2 and Section D.2. The source also requested that the allowable PM emission rate be changed to incorporated EU#40 with EU#17.

The allowable PM emission rate for EU#40 has been incorporated into the existing allowable PM emission rate of 12.1 pounds per hour for EU#17 as indicated in Condition D.2.1. The potential to emit PM from EU#40 is less than the exemption level of five (5) tons per year and therefore Condition D.2.3 has been added and all subsequent conditions and references have been renumbered. The elimination of EU#22 also does not increase the allowable PM emission rate for the remaining emission units.

(aa) One (1) mixed binder surge hopper scale system, known as EU#40, installed in 2000, equipped with an existing baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of powdered binders per hour.

~~Three (3)~~ **Two (2)** augers, known as ~~EU#22, EU#23 and EU#24~~, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the indicated facilities shall not exceed the PM emission limitations specified at the specified process weight rates listed in following table:

Emission Unit(s)	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
EU#21 - EU#24 EU#21, EU#23 & EU#24	12.0, each	21.7, each
EU#17 and EU#40	5.0, each	12.1 total

D.2.3 Part 70 Permits: source modifications [326 IAC 2-7-10.5]

The particulate matter (PM) and PM₁₀ emissions from EU#40 shall not exceed 1.14 pounds per hour in order to avoid the requirements of 326 IAC 2-7-10.5.

5. The source has requested that the range of pressure drops in Condition D.2.7 (now D.2.8) be changed:

D.2.78 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#5 - CE#9) used in conjunction with emission units EU# 7, 8, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 27 and 28 at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#5 and CE#6 shall be maintained within the range of **1.0 ~~2.0~~** and **6.0 ~~7.0~~** inches of water, the pressure drop across baghouses CE#7 and CE#8 shall be maintained within the range of 1.0 and 6.0 inches of water, and the pressure drop across baghouse CE#9 shall be maintained within the range of **0.2 ~~0.5~~** and **6.0 ~~2.0~~** inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Title V permit with all the changes made to it is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

MLK/MES

cc: File - Huntington County
U.S. EPA, Region V
Huntington County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**United States Mineral Products Company
d/b/a Isolatek International
701 North Broadway
Huntington, IN 46750**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 069-11828-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 28, 1999

First Administrative Amendment, AAT 069-11828-00021, issued March 3, 2000.

Second Administrative Amendment: AAT 069-12578	Pages Affected: 5 - 7, 30, and 34 - 38
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary acoustic and thermal insulation manufacturing source.

Responsible Official: Thomas Lund
Source Address: 701 North Broadway, Huntington, Indiana 46750
Mailing Address: P.O. Box 5006, Huntington, Indiana 46750
SIC Code: 3296
County Location: Huntington
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) short stack # 1 and # 2 cupolas, known as EU#1 and EU#2, installed before 1960, each equipped with a baghouse, known as CE#1 and CE#2, exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.
- (b) Two (2) blowchambers, known as EU#3 and EU#4, installed before 1978, each equipped with a screenhouse, known as CE#3 and CE#4, (#1 and #2 screenhouse), capacity: 6.0 tons of fibers per hour, each.
- (c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.
- (d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.
- (e) One (1) live bottom hopper, known as EU#19, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.
- (f) One (1) granulator, known as EU#20, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.
- (g) One (1) bagger, known as EU#21, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.

- (h) Two (2) augers, known as EU#23 and EU#24, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.
- (i) One (1) portable hopper, known as EU#27 (portable hopper #3), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour.
- (j) One (1) hammermill/cyclone, known as EU#28, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 2.0 tons of mineral wool per hour.
- (k) Two (2) portable hoppers, known as EU#25 and EU#26, (portable hoppers #1 and #2, respectively), installed in 1980, exhausted inside the building, capacity: 0.75 tons of dry powdered binders per hour, each.
- (l) Two (2) mineral wool balers, known as EU#5 and EU#6, installed before 1980, exhausted inside the building, capacity: 6.0 tons of baled mineral wool per hour, each.
- (m) One (1) front end mineral wool bagger, known as EU#7, installed in 1987, equipped with a baghouse, known as CE#5, exhausted to Stack #5, capacity: 5.0 tons of bagged mineral wool per hour.
- (n) One (1) mineral wool bin, known as EU#8, installed in 1983 or 1984, equipped with a pneumatic conveyor that incorporates a totally enclosed air recycled system, capacity: 10.0 tons of mineral wool per hour.
- (o) One (1) gypsum silo, known as EU#9, installed before 1980, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.
- (p) One (1) chipped gypsum silo, known as EU#10, installed in 1991, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.
- (q) One (1) cement silo, known as EU#11, installed in 1990, equipped with a baghouse, known as CE#7, exhausted to Stack #7, capacity: 54.0 tons of Portland cement per hour.
- (r) One (1) batch blender, known as EU#12, installed in 1993, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 5.0 tons of blended product per hour.
- (s) One (1) debaler, known as EU#13, installed in 1980, exhausted inside the building, capacity: 5.0 tons of mineral wool per hour.
- (t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: 216 tons of rock, slag and coke per hour.
- (u) One (1) batching station, known as EU#30, installed prior to 1980, capacity: 14.4 tons of rock and coke per hour.
- (v) One (1) ribbon blender, known as EU# 31, installed in 1988, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 2.0 tons of dry powdered binders per year.
- (w) One (1) dedust oil tank, known as EU#34, installed prior to 1980, exhausted to Stack # 17, capacity: 7,000 gallons.

- (x) One (1) PEG400 VOC tank, known as EU#35, installed in 1990, capacity: 8,000 gallons.
- (y) One (1) Dedust oil tank, known as EU#38, installed in 1997, exhausted to Stack #21, capacity: 8,000 gallons.
- (z) Removed by AAT 069-12578
- (aa) One (1) mixed binder surge hopper scale system, known as EU#40, installed in 2000, equipped with an existing baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of powdered binders per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

D.1.4 Particulate Matter (PM)

The baghouses (CE#1 and/or CE#2) and the screenhouses (CE#3 and/or CE#4) for PM control shall be in operation at all times when the cupolas (EU#1 and/or EU#2) and the blowchambers (EU#3 and/or EU#4) are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the two (2) cupola (EU#1 and #2) and two blowchamber (EU#3 and #4) stack exhausts (Stack #1, #2, #3 and #4) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#1 and CE#2) and screenhouses (CE#3 and CE#4) used in conjunction with the two (2) cupolas and two (2) blowchambers, at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#1 and CE#2 shall be maintained within the range of 3.0 and 12.0 inches of water and the pressure drop across screenhouses CE#3 and CE#4 shall be maintained within the range of 0.2 and 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse and Screenhouse Inspections

- (a) An inspection shall be performed each calendar quarter of all bags controlling the two (2) cupolas when venting to the atmosphere. All defective bags shall be replaced or the associated tubesheet opening capped as long as no more than ten percent (10%) of the number of total bags; thirty (30) bags for the cupola #1 baghouse; and sixty (60) bags for the cupola #2 baghouse, are capped.
- (b) An inspection shall be performed each calendar quarter of all screens controlling the two (2) blowchambers when venting to the atmosphere. All defective screens shall be replaced.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.
- (d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.
- (e) One (1) live bottom hopper, known as EU#19, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.
- (f) One (1) granulator, known as EU#20, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.
- (g) One (1) bagger, known as EU#21, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.
- (h) Two (2) augers, known as EU#23 and EU#24, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour, each.
- (i) One (1) portable hopper, known as EU#27 (portable hopper #3), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour.
- (j) One (1) hammermill/cyclone, known as EU#28, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 2.0 tons of mineral wool per hour.
- (k) Two (2) portable hoppers, known as EU#25 and EU#26, (portable hoppers #1 and #2, respectively), installed in 1980, exhausted inside the building, capacity: 0.75 tons of dry powdered binders per hour, each.
- (l) Two (2) mineral wool balers, known as EU#5 and EU#6, installed before 1980, exhausted inside the building, capacity: 6.0 tons of baled mineral wool per hour, each.
- (m) One (1) front end mineral wool bagger, known as EU#7, installed in 1987, equipped with a baghouse, known as CE#5, exhausted to Stack #5, capacity: 5.0 tons of bagged mineral wool per hour.
- (n) One (1) mineral wool bin, known as EU#8, installed in 1983 or 1984, equipped with a pneumatic conveyor that incorporates a totally enclosed air recycled system, capacity: 10.0 tons of mineral wool per hour.
- (o) One (1) gypsum silo, known as EU#9, installed before 1980, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.
- (p) One (1) chipped gypsum silo, known as EU#10, installed in 1991, equipped with a baghouse, known as CE#8, exhausted to Stack #8, capacity: 54.0 tons of gypsum per hour.
- (q) One (1) cement silo, known as EU#11, installed in 1990, equipped with a baghouse, known as CE#7, exhausted to Stack #7, capacity: 54.0 tons of Portland cement per hour.
- (r) One (1) batch blender, known as EU#12, installed in 1993, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 5.0 tons of blended product per hour.
- (s) One (1) debaler, known as EU#13, installed in 1980, exhausted inside the building, capacity: 5.0 tons of mineral wool per hour.
- (t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: 216 tons of rock, slag and coke per hour.
- (u) One (1) batching station, known as EU#30, installed prior to 1980, capacity: 14.4 tons of rock and coke per hour.
- (v) One (1) ribbon blender, known as EU# 31, installed in 1988, equipped with a baghouse, known as CE#6, exhausted to Stack #6, capacity: 2.0 tons of dry powdered binders per year.
- (w) One (1) dedust oil tank, known as EU#34, installed prior to 1980, exhausted to Stack # 17, capacity: 7,000 gallons.
- (x) One (1) PEG400 VOC tank, known as EU#35, installed in 1990, capacity: 8,000 gallons.
- (y) One (1) Dedust oil tank, known as EU#38, installed in 1997, exhausted to Stack #21, capacity: 8,000 gallons.
- (z) Removed by AAT 069-12578.
- (aa) One (1) mixed binder surge hopper scale system, known as EU#40, installed in 2000, equipped with an existing baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of powdered binders per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the indicated facilities shall not exceed the PM emission limitations specified at the specified process weight rates listed in following table:

Emission Unit(s)	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
EU#5 and EU#6	6.0, each	13.6, each
EU#7	5.0	12.1
EU#8	10.0	19.2
EU#9 and EU#10	54.0, each	45.3, each
EU#11	54.0	45.3
EU#12 and EU#13	5.0, each	12.1, each
EU#14 and EU#15	5.0, each	12.1, each
EU#16	0.2	1.40
EU#17 & EU#40	5.0, each	12.1 total
EU#18	0.2	1.40
EU#19 and EU#20	8.0, each	16.5, each
EU#21, EU #23 & EU#24	12.0, each	21.7, each
EU#25 and EU#26	0.75, each	3.38, each
EU#27	0.2	1.40
EU#28	2.0	6.52
EU#31	2.0	6.52

The pounds per hour limitations were calculated with the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

and

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.} \end{array}$$

D.2.2 Prevention of Significant Deterioration [326 IAC 2-2]

Any change or modification for these emission units which may increase potential to emit to 25 tons per year for PM and 15 tons per year for PM₁₀ shall require approval from IDEM, OAM prior to making the change.

D.2.3 Part 70 Permits: source modifications [326 IAC 2-7-10.5]

The particulate matter (PM) and PM₁₀ emissions from EU#40 shall not exceed 1.14 pounds per hour in order to avoid the requirements of 326 IAC 2-7-10.5.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities, EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19 - EU#24 and EU#27, and their control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)

The baghouses (CE#5 - CE#9) for PM control shall be in operation at all times when their facilities are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of emission units EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19, EU#24 and EU#27 stack exhausts (Stack #5, #6, #7, #8 and #9) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#5 - CE#9) used in conjunction with emission units EU# 7, 8, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 27 and 28 at least once daily when the insulation manufacturing processes are in operation when venting

to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#5 and CE#6 shall be maintained within the range of 1.0 and 6.0 inches of water, the pressure drop across baghouses CE#7 and CE#8 shall be maintained within the range of 1.0 and 6.0 inches of water, and the pressure drop across baghouse CE#9 shall be maintained within the range of 0.2 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the insulation manufacturing operations when venting to the atmosphere. All defective bags shall be replaced or the associated tubesheet opening capped as long as no more than ten percent (10%) of the number of total bags are capped.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The process associated with the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, the process associated with the failed baghouse will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the facilities stack exhausts once per shift.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.

- (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and the dates the vents are re-directed.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.